

**SPEARS & IMES** LLP

51 Madison Avenue  
New York, NY 10010  
tel 212 213-6996  
fax 212 213-0849


Max Nicholas  
tel 212-213-1715  
mnicholas@spearsimes.com

June 14, 2021

Application Granted.  
SO ORDERED.  
Dated: 6/15/2021

**BY ECF**

Hon. P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

  
P. Kevin Castel  
United States District Judge

Re: *United States v. Rene Allard*, S4 20 Cr. 163 (PKC)

Dear Judge Castel:

We respectfully write on behalf of defendant Rene Allard to request a temporary modification of the travel restrictions that are part of his bail conditions. Both the Government and the Pretrial Services Officer who is supervising Mr. Allard in his district of residence, the Middle District of Pennsylvania, consent to this request.

[ Mr. Allard respectfully requests permission to travel from the Middle District of Pennsylvania to the Eastern District of Pennsylvania on July 1, 2021, and to return on July 3, 2021.] The purpose of this request is to allow Mr. Allard to retrieve a bulk order of food that he placed from a market in the Eastern District of Pennsylvania, and to attend an auction at which he may purchase either a pony or a miniature cow for his family. For the avoidance of doubt, this would be a recreational animal, not an animal that would be entered into any race.

Thank you for your consideration of this request.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Max Nicholas  
Attorney for Rene Allard